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My name is Christopher Johnson, owner of Amateur station WA2ZDY. I have been licensed almost 32 years and an Extra class licensee almost 29. I thus feel competent to comment on this RM based on extensive experience as an amateur operator and station licensee.

This proposed change is a good one. The actual meaning of 97.119(a) is misunderstood by many amateurs. This statement is supported by fairly frequent revisitations of this by posters on amateur radio related internet discussion forums like "qrz.com." This results in some amateurs, despite good intentions, to either violate this rule or to go to the opposite and identify at the start of a communication.

Mr Zook's proposal that identification at the start of a communication be reinstated as a requirement is a good one. It will eliminate the current ambiguity in 97.119(a) as well as provide for more clear identification of transmissions on the Amateur service frequency bands.

There is no legitimate reason for a station not to identify at the beginning of a transmission. And in the case of repeater use, it is fair for the owners of same to expect to know who exactly is using their repeater stations. If this rule is changed as proposed, there is the added benefit of anyone monitoring for enforcement reasons not to have to invest excessive time in waiting for a station identification.

There would be no unreasonable burden to be had by any amateur operator by the proposed change. The benefit would be more identifiable transmissions.